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**Testimony: H.B. 5129 An Act Concerning The Administration of  
Vaccines By Pharmacists and Medical Assistants and listing of Certified  
Medical Assistants**

PUBLIC HEALTH COMMITTEE

February 16, 2016

Good Morning, Senator Gerratana and Representative Ritter and esteemed members of the Public Health Committee.

Thank-you for the opportunity to provide testimony on behalf of the Connecticut Nurses' Association on **H.B. 5129 An Act Concerning The Administration of Vaccines By Pharmacists and Medical Assistants and listing of Certified Medical Assistants.**

I am Mary Jane Williams Ph.D., RN current chairperson of Government Relations Committee for the Connecticut Nurses Association and professor emeritus from Central Connecticut State University. **I speak in strong opposition to H.B. 5129 An Act Concerning The Administration of Vaccines By Pharmacists and Medical Assistants and listing of Certified Medical Assistants as written.**

The Connecticut Nurses Association does not support Section 1 (a) (2) to any person under the age of eighteen, influenza vaccine approved by the United States Food and Drug Administration. **We also speak in Strong Opposition to Section 2.**

The process of administration of Medication is not a simple task. It requires skill, knowledge and judgment. In order to correctly administer medications the individual who is responsible for administering the medication must be able to assess the patient, as this is the first step in the process of Medication Administration.

Assessment of patients is not a competency that is in the medication assistant curriculum. Therefore the medication assistant will be taking an order from a Physician and administering medication without the any depth of knowledge related to a potential diagnosis and treatment. Without understanding the diagnosis or multiple diagnoses and how they relate to the pharmacologic aspects of the drug. The medication Assistant is uninformed about the knowledge and process essential to the administration and the essential follow up, which includes any potential issues, allergic reactions and/or contraindications with the Medication. The Medication assistant has not dealt with issues related to diversity, culture and language that affect the learning process.

**The Medication Assistant does not have the education essential to client health and safety and/ or the ability to foster continued adaptation, which is essential to this process.**

The Registered Nurse is responsible for collection of data, assessment, and medication administration after checking the order for the five rights, determines which Medications to give, follows up to determine the response to the Medication, annotates appropriately and provides guidance and education for the patient.

It has been reported by the American Nurses Association in a formal statement that medication errors are among the most common medical errors, harming at least 1.5 million people annually. The same report cites the extra medical costs associated with treating drug related errors occurring in hospitals alone amount to \$3.5 billion per year. (Institute of Medicine of the National Academies, July 2006). Since errors occur, not just in hospitals, but in multiple settings, this is believed to be a conservative estimate. Medication errors are attributed to a number of system failures, including the process of administration. The Institute of Medicine's (IOM) 1999 report,

"To Err is Human" has served as a blueprint for improvements in the health care system, recommending a number of strategies shown to reduce errors in the medication process. In spite of some progress in implementation of some of the suggestions, the number of errors continues to be staggering. This is compounded by the belief there is underreporting of errors in general. Underreporting has, in part, been attributed to a failure of a standardized definition of an error. Is a "near miss" reportable? Another contributing factor is the fear of reprimand that still pervades the psyche of some practitioners. Although there has been no documentation pointing to administration errors resulting from harried nurses and inadequate

staffing, this is likely less about identifying the root cause, but more about what is reported.

The 1999 IOM report recognized the complexity associated with medication administration and in particular the multiple tasks performed by nurses. What was lacking at that time is recognition of the cognitive processes in which nurses engage while administering medications. The processes nurses use during medication administration to prevent errors, prevent harm and promote therapeutic responses are not well known. Studies of nurses and nursing students thinking processes have produced inconsistent findings, complicated by the multiplicity of terms.

However, the Journal of Nursing Scholarship (First Quarter 2007) described a study designed to explain nurses' reported thinking processes during medication administration. The study revealed ten descriptive categories of nurse's thinking: communication, dose time, checking, assessment, evaluation, teaching, side effects, work-arounds, anticipatory problem solving, and drug administration. The researchers concluded that nurse's thinking processes extend beyond rules and procedures as nurses use patient data and interdisciplinary knowledge when administering medications. The study demonstrated the considerable use of the nurse's clinical knowledge, experience and understanding of patient's patterns of response and potential problems when engaged in the medication process. For example, nurses integrated their knowledge of patient's laboratory values and pattern of individual patho- physiological responses to determine the need for a change in drug dose or time and subsequent communication to the prescriber. Checking for the correctness and validity of the order is a step in thinking that has resulted in the reduction of errors, commonly known as near misses. The technical portion of medication administration includes the commonly held steps, known as the five rights, the right: patient, medication, dose, route, and time. Wilson and Divito-Thomas (2004) proposed a sixth right to the well established five rights of medication administration, that of "the right response of the patient to the medication".

This right can be equated to the nurse's thinking associated with evaluation. Another example of nurses' thinking include what the researchers referred to as work a-rounds, representing the thinking about steps nurses need to use to bypass procedures in order to expedite getting drugs to the patients in a more timely fashion for a therapeutic response. This study found the actual act of administering a medication is a small part of the professional role in medication administration. The ten categories of thinking during medication administration indicate the intellectual complexity of the process.

The findings of the first national survey of medication aides was reported by the National Council of State Boards of Nursing (NCSBN) in the October 2011 issue of the Journal of Nursing Regulation. **The data from this study imply that a disparity exists between regulation and practice. Medication aides reported being required to take on responsibilities beyond their defined role and training, some without sufficient supervision, if any.**

So what does this mean for states in which assistive personnel are or may become authorized to administer medications? Although the "task" has been shifted to assistive personnel, responsibility for the nursing care outcome remains with the nurse. Is the delegation of medication administration to assistive personnel whose training requirements are not standardized the best approach to ensuring the delivery of safe and quality nursing care? Like so much of the practice of registered nurses, it is not about tasks. Nurses must be present when policy and statutory changes are being discussed and be prepared to describe what unique contributions they make and recognize the implications associated with proposed changes. Also, strict compliance with state regulations, appropriate education and adequate supervision are essential. (Janet Haebler MSN, RN, Associate Director, ANA State Government Affairs at [janet.haebler@ana.org](mailto:janet.haebler@ana.org).)

**What is being asked for in this Proposed legislation is permission for Physician to hire the lowest level health provider and then allow them to administer Medications without the necessary knowledge base that facilitates the safe administration of Medications, with the safe follow-up by an individual who has the education to support the behavior. This activity will occur in setting that provides care to the most disenfranchised patients with the most diverse needs. Ultimately allowing this individual puts the most vulnerable populations at risk. It has the potential for actually increasing health care cost.**

The Pharmacist is highly educated, has a depth and breath of knowledge related to Anatomy, Physiology, Chemistry, Absorption, and contraindications to name a few of the essential knowledge and skills essential to the administration of Medications.

The Medical Assistant has minimal education, no accountability to license, do not carry malpractice, have a lack of knowledge related to Anatomy, Physiology, Chemistry, Absorption and Contraindications. They are not prepared to ask the appropriate questions or provide appropriate education.

**However, we continue to be asked to allow this group of individuals to administer medications to the most vulnerable population, in spite of the fact that we as professionals are charged by our Code of Ethics to protect**

**the Public we serve.**

**Therefore I urge you to oppose H.B. No. 5129 An Act Concerning The  
Administration of Vaccines By Pharmacists and Medical Assistants and  
listing of Certified Medical Assistants as written.**

It does not protect the public we serve.

Thank you

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<https://brightfutures.org/bf2/pdf/pdf/Schedule.pdf>